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Attorneys for Prada USA Corp.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HELEN BREWER, individually

Plaintiff,

V.

PRADA USA CORP., a Foreign
Corporation,

Defendants.

Case No.: 2:16-cv-001192-MMD-CWH

**DEFENDANT'S REQUEST FOR
EXCEPTION TO EARLY NEUTRAL
EVALUATION ATTENDANCE
REQUIREMENTS**

Defendant PRADA USA Corp. (“Defendant”), by and through its counsel Jackson Lewis P.C., hereby respectfully requests an exception to the early neutral evaluation (“ENE”) attendance requirements.

Defendant is insured with Ironshore, Inc. However, Defendant's insurance policy contains a substantial self-insured retention (near the Title VII damages cap for large employers); and, given Plaintiff's single claim of discrimination in this case, any resolution at the ENE will be within Defendant's self-insured retention. As such, Defendant respectfully requests that a representative from Defendant's insurance carrier be excused from attending in person the ENE; however, a

1 representative will be available telephonically as needed.

2 The parties conferred regarding this request on August 3, 2016. Plaintiff's counsel indicated
3 that she has no objection to the representative of the insurance company appearing telephonically
4 as needed. Moreover, participation by the insurance carrier via telephone will not adversely affect
5 the ENE, and Defendant will attend the ENE with appropriate settlement authority.

6 Based on the foregoing, Defendant respectfully requests the insurance carrier be excused
7 from in-person attendance, and to the extent necessary be allowed to attend the ENE telephonically
8 as needed.

9 Dated this 3 day of August 2016

10 JACKSON LEWIS P.C.

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18 *Attorneys for Defendant Prada USA Corp.*

19 **IT IS SO ORDERED.**

20 
21 **UNITED STATES MAGISTRATE JUDGE**
22 **DATED:** 8-3-2016

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Jackson Lewis P.C. and that on this 3rd day of August, 2016, I caused to be served a true and correct copy of the above and foregoing

DEFENDANT'S REQUEST FOR EXCEPTION TO EARLY NEUTRAL EVALUATION

ATTENDANCE REQUIREMENTS via ECF Filing, properly addressed to the following:

Ruth L. Cohen, Esq.
PAUL PADDA LAW, PLLC
4240 W. Flamingo Road, Suite 220
Las Vegas, Nevada 89103
(702) 366-1888

Kelly Chandler
Employee of Jackson Lewis, P.C.

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